ATTACHMENT H - NPDES Permit Rating Worksheet

NPDES PERMIT RATING WORK SHEET

☐ Regular Addition
☐ DiscretionaryAddition
☑ Score change, but no status change
☐ Deletion

NPDES NO. VA0003646

Facility Name: MeadWestvaco of Virginia, Inc. (Covington Operations)

City: Covington, Virginia

Receiving Water: Jackson River, Upper James River watershed

Reach Number:

Is this facility a steam electric power plant (SIC=4911) with one or more of the following characteristics?

1. Power output 500 MW or greater (not using a cooling pond/lake)
2. A nuclear power plant
3. Cooling water discharge greater than 25% of the receiving stream's 7Q10 flow rate

☐ YES; score is 600 (stop here) ☑ NO (continue)

Is this permit for a municipal separate storm sewer serving a population greater than 100,000?

☐ YES; score is 700 (stop here)

☑ NO (continue)

FACTOR 1: Toxic Pollutant Potential

PCS SIC Code: 3312 Primary SIC Code: 2631 (Paperboard Manufacturing 40 CFR 420, Subparts B

Other SIC Codes: 2819 (Activated Carbon Manufacturing)

Industrial Subcategory Code: 022 (Code 000 if no subcategory)

Determine the Toxicity potential from Appendix A. Be sure to use the TOTAL toxicity potential column and check one)

Toxicity Group	Code	Points	Toxicity Group	Code	Points	Toxicity Group	Code	Points
☐ No process waste streams	0	0	☐ 3.	3	15	☐ 7.	7	35
☐ 1.	1	5	☐ 4.	4	20	☐ 8.	8	40
☐ 2.	2	10	☐ 5.	5	25	☐ 9.	9	45
			☐ 6.	6	30	☑ 10.	10	50

Code Number Checked: 10

Total Points Factor 1: **50**

FACTOR 2: Flow/Stream Flow Volume (*Complete either Section A or Section B; check only one)*

Section A ☐ Wastewater Flow Only Considered

Wastewater Type (See Instructions)		Code	Points
Type I: Flow < 5 MGD	☐	11	0
Flow 5 to 10 MGD	☐	12	10
Flow > 10 to 50 MGD	☐	13	20
Flow > 50 MGD	☐	14	30
Type II: Flow < 1 MGD	☐	21	10
Flow 1 to 5 MGD	☐	22	20
Flow > 5 to 10 MGD	☐	23	30
Flow > 10 MGD	☐	24	50
Type III: Flow < 1 MGD	☐	31	0
Flow 1 to 5 MGD	☐	32	10
Flow > 5 to 10 MGD	☐	33	20
Flow > 10 MGD	☐	34	30

Section B ☐ Wastewater and Stream Flow Considered

Wastewater Type (See Instructions)	Percent of instream Wastewater Concentration at Receiving Stream Low Flow		Code	Points
Type I/III:	< 10 %	☐	41	0
	10 % to < 50 %	☐	42	10
	> 50 %	☐	43	20
Type II:	< 10 %	☐	51	0
	10 % to <50 %	☐	52	20
	> 50 %	☑	53	30

Code Checked from Section A or B: 53

Total Points Factor 2: 30

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FACTOR 3: Conventional Pollutants NPDES NO: VA0003646
(only when limited by the permit)

A. Oxygen Demanding Pollutant: (check one) ☑ BOD ☐ COD ☐ Other:_____

			Code	*Points*
Permit Limits: (check one)	☐	< 100 lbs/day	1	0
	☐	100 to 1000 lbs/day	2	5
	☐	> 1000 to 3000 lbs/day	3	15
	☑	> 3000 lbs/day	4	20

Code Checked: 4

Points Scored: **20**

B. Total Suspended Solids (TSS):

			Code	*Points*
Permit Limits: (check one)	☐	< 100 lbs/day	1	0
	☐	100 to 1000 lbs/day	2	5
	☐	> 1000 to 5000 lbs/day	3	15
	☑	> 5000 lbs/day	4	20

Code Checked: 4

Points Scored: **20**

C. Nitrogen Pollutant: (check one) ☐ Ammonia ☑ Other: Nitrogen, seasonal TMDL load

		Nitrogen Equivalent	*Code*	*Points*
Permit Limits: (check one)	☐	< 300 lbs/day	1	0
	☑	300 to 1000 lbs/day	2	5
	☐	> 1000 to 3000 lbs/day	3	15
	☐	> 3000 lbs/day	4	20

Code Checked: 2

Points Scored: **5**

Total Points Factor 3: **45**

FACTOR 4: Public Health Impact

Is there a public drinking water supply located within 50 miles downstream of the effluent discharge (this includes any body of water to which the receiving water is a tributary)? A public drinking water supply may include infiltration galleries, or other methods of conveyance that ultimately get water from the above referenced supply.

☐ YES (If yes, check toxicity potential number below)

☑ NO (If no, go to Factor 5)

Determine the *human health* toxicity potential from Appendix A. Use the same SIC code and subcategory reference as in Factor 1. (Be sure to use the human health toxicity group column ? check one below)

Toxicity Group	Code	Points	Toxicity Group	Code	Points	Toxicity Group	Code	Points
☐ No process waste streams	0	0	☐ 3.	3	0	☐ 7.	7	15
☐ 1.	1	0	☐ 4.	4	0	☐ 8.	8	20
☐ 2.	2	0	☐ 5.	5	5	☐ 9.	9	25
			☐ 6.	6	10	☐ 10.	10	30

Code Number Checked: _____

Total Points Factor 4: **0**

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FACTOR 5: Water Quality Factors NPDES NO: VA0003646

A. Is (or will) one or more of the effluent discharge limits based on water quality factors of the receiving stream (rather than technology-based federal effluent guidelines, or technology-based state effluent guidelines), or has a wasteload allocation been assigned to the discharge:

		Code	Points
☑	Yes	1	10
☐	No	2	0

B. Is the receiving water in compliance with applicable water quality standards for pollutants that are water quality limited in the permit?

		Code	Points
☐	Yes	1	0
☑	No	2	5

C. Does the effluent discharged from this facility exhibit the reasonable potential to violate water quality standards due to whole effluent toxicity?

		Code	Points
☑	Yes	1	10
☐	No	2	0

Code Number Checked: A **1** B **2** C **1**

Points Factor 5: A **10** + B **5** + C **10** = **25** TOTAL

FACTOR 6: Proximity to Near Coastal Waters

A. Base Score: Enter flow code here (from Factor 2): 53 *Enter the multiplication factor that corresponds to the flow code:* 0.6

Check appropriate facility HPRI Code (from PCS):

	HPRI#	*Code*	*HPRI Score*
☐	1	1	20
☐	2	2	0
☐	3	3	30
☑	4	4	0
☐	5	5	20

HPRI code checked: 4

Flow Code	*Multiplication Factor*
11, 31, or 41	0.00
12, 32, or 42	0.05
13, 33, or 43	0.10
14 or 34	0.15
21 or 51	0.10
22 or 52	0.30
23 or 53	0.60
24	1.00

Base Score: (HPRI Score) 0 X (Multiplication Factor) 0.6 = **0** (TOTAL POINTS)

B. Additional Points ☐ NEP Program
For a facility that has an HPRI code of 3, does the facility discharge to one of the estuaries enrolled in the National Estuary Protection (NEP) program (see instructions) or the Chesapeake Bay?

	Code	Points
☐ Yes	1	10
☐ No	2	0

Code Number Checked:

C. Additional Points ☐ Great Lakes Area of Concern
For a facility that has an HPRI code of 5, does the facility discharge any of the pollutants of concern into one of the Great Lakes' 31 areas of concern (see Instructions)

	Code	Points
☐ Yes	1	10
☐ No	2	0

A __ B __ C __

Points Factor 6: A __ + B __ + C __ = **0** TOTAL

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SCORE SUMMARY NPDES NO: VA0003646

Factor	Description	Total Points
1	Toxic Pollutant Potential	50
2	Flows/Streamflow Volume	30
3	Conventional Pollutants	45
4	Public Health Impacts	0
5	Water Quality Factors	25
6	Proximity to Near Coastal Waters	0
	TOTAL (Factors 1 through 6)	**150**

S1. Is the total score equal to or greater than 80? ☑ Yes (Facility is a major) ☐ No

S2. If the answer to the above questions is no, would you like this facility to be discretionary major?

☐ No

☐ Yes (Add 500 points to the above score and provide reason below:

Reason: _____

NEW SCORE: **150**

OLD SCORE: **135**

Susan K. Edwards
Permit Reviewer's Name

(540) 562-6764
Phone Number

March 12, 2012
Date